

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK**

|                                 |   |                                |
|---------------------------------|---|--------------------------------|
| <b>UNITED STATES OF AMERICA</b> | ) | Criminal No. 1:15-CR-250 (TJM) |
|                                 | ) |                                |
| v.                              | ) |                                |
|                                 | ) |                                |
| <b>NICHOLAS KHAN,</b>           | ) |                                |
| <b>a/k/a Netti,</b>             | ) |                                |
|                                 | ) |                                |
|                                 | ) |                                |
|                                 | ) |                                |
| <b>Defendant.</b>               | ) |                                |

**GOVERNMENT’S PROPOSED VOIR DIRE**

The United States of America, pursuant to Rule 24(a) of the Federal Rules of Criminal Procedure and the Court’s Pretrial Order, asks the Court to inquire into general matters concerning each potential juror, including the juror’s name, city of residence, employment, educational background, criminal history, prior jury service, and similar matters.<sup>1</sup> In addition, the United States further respectfully requests that the Court ask potential jurors the following questions:

1. Have you or any of your friends and relatives ever had any experiences with the Drug Enforcement Administration, the Drug Enforcement Administration’s Northeast

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<sup>1</sup> These questions may include:

1. Please state your full name.
2. What is your occupation? If you are retired or not currently working, please state what your last employment was.
3. Are you married?
4. Is your spouse employed? If so, what type of work does he or she do? Do you have any children of working age?
  - a. If so, how many and what type of work do they do?

Laboratory, or with law enforcement in general, that would influence your ability to serve as a fair and impartial juror in this matter?

2. Do you have any personal objections to the laws of the United States that make it a crime to possess, distribute, or conspire to distribute controlled substances?

3. Do you have any personal objections to the laws of the United States that make it a crime to possess, distribute, or conspire to distribute cocaine base, or crack cocaine?

4. Do you have any personal objections or strong views regarding the government's use of cooperating informants who are operating in an undercover capacity, unbeknownst to the targets of the investigations?

5. Do you have any personal objections or strong views regarding the government's use of law enforcement officials who are operating in an undercover capacity?

6. Do you have any personal objections to law enforcement working with, instructing, or directing confidential informants who have agreed to work for law enforcement in an attempt to receive leniency from the government on a criminal matter?

7. Some of the evidence in this trial may consist of recordings of telephone calls and in-person conversations of the defendant and/or others recorded without their knowledge. These investigative techniques are lawful and you may properly consider the evidence obtained through these techniques. Do you have any personal objection to law enforcement making or using these types of recordings in carrying out a criminal investigation?

8. Do you have any personal views regarding the drug laws of the United States, the drug laws or sentences relating to crack cocaine, or the United States criminal justice system in general that would influence your ability to serve as a fair and impartial juror in this case?

9. Is there anything that you may have viewed in newspapers, magazines, television, the radio, or the Internet relating to crack cocaine or the United States criminal justice system in general that would influence your ability to serve as a fair and impartial juror in this case?

Dated: July 17, 2016

Respectfully submitted,

RICHARD S. HARTUNIAN  
United States Attorney

By: /s/ Kofi Sansculotte  
Kofi Sansculotte  
Assistant United States Attorney  
Bar Roll No. 519151